

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

DANIEL ANDERSEN,)	
)	
Plaintiff,)	16 cv 1963
)	
v.)	District Judge Kendall
)	
CITY OF CHICAGO, et al.)	
)	
Defendants.)	JURY TRIAL DEMANDED

PLAINTIFF'S MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Local Rules 5.8 and 26.2, Plaintiff Daniel Andersen, by his attorneys, respectfully requests an order granting Plaintiff permission to file Plaintiff's Responses to Defendants' Proffer Regarding Julie Lopez (dkt 755) and to Defendants' Motion to Conduct Depositions Regarding Julie Lopez (Dkt. 751) under seal, stating as follows:

1. Plaintiff's Response to Defendant's Proffer Regarding Julie Lopez and corresponding exhibits, as well as his response to Defendants' Motion to Conduct Depositions Regarding Julie Lopez, which are to be filed later today, contain confidential information subject to various confidentiality and protective orders in this case.

2. Accordingly, good cause exists to allow Plaintiff to file these documents under seal rather than publicly.

3. In compliance with Local Rules 5.8 and 26.2, Plaintiff: (a) will provisionally file exhibits electronically under seal after filing this motion; (b) will file electronically a public-record version of his motion and exhibit; and (c) now move this Court for leave to file the non-redacted version of his motion and any exhibits containing confidential information under seal.

4. Plaintiff requests leave to file the following responses and corresponding exhibits under seal:

Plaintiff's Response to Defendants' Proffer Regarding Julie Lopez (Dkt. 755)

Plaintiff's Response to Defendants' Proffer Regarding Julie Lopez (Dkt. 755) – Exhibit A (In Entirety)

Plaintiff's Response to Defendants' Proffer Regarding Julie Lopez (Dkt. 755) – Exhibit B (In Entirety)

Plaintiff's Response to Defendants' Proffer Regarding Julie Lopez (Dkt. 755) – Exhibit C (In Entirety)

Plaintiff's Response to Defendants' Motion to Conduct Depositions Regarding Julie Lopez (Dkt. 751)

WHEREFORE, Plaintiff respectfully requests that the Court enter an order granting him permission to file the aforementioned responses and exhibits under seal.

DATED: January 15, 2021

RESPECTFULLY SUBMITTED,

/s/ Josh Tepfer
One of Plaintiff's Attorneys

Jon Loevy
Arthur Loevy
Heather Lewis Donnell
Roshna Bala Keen
Josh Tepfer
Lindsay Hagy
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CERTIFICATE OF SERVICE

I, Josh Tepfer, an attorney, hereby certify that on January 15, 2021, I filed the foregoing Motion to For Leave to File Under Seal Instructions via the Court's CM/ECF system, which effected service on all Counsel of Record.

/s/ Josh Tepfer
One of Plaintiff's Attorneys